

**THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:
LESLIE CAROLINE BLAIR
RAMOS-IZQUIERDO
Social Security: xxx-xx-0753

CASE NO. 20-01125-MCF/NW
CHAPTER 7

Address:
UNIVERSITY GARDENS
774 GEORGETOWN
SAN JUAN, PR 00927

DEBTOR

MOTION REQUESTING LEAVE TO REPLY

TO THE HONORABLE COURT:

COMES NOW DEBTOR, represented by Legal Partners, PSC., and through the undersigned attorney respectfully represents and prays as follows:

1. The Chapter 7 Trustee, on 06/16/2020, filed a motion at docket entry number 33, opposing Debtor's right to convert to Chapter 13, to which the appearing party seeks leave to reply, herein after "the motion".

2. After reviewing the "motion", the appearing party, as required by Local Rule 7(c), hereby requests from this Honorable Court leave to reply to the "motion", extending the Local Rules term to file our reply by (21) days.

NOTICE OF OPPORTUNITY TO OBJECT PURSUANT TO LBR 9013-1(h)

Pursuant to Local Bankruptcy Rule 3015-2, within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file

an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

WHEREFORE we pray from this Honorable Court to grant leave to answer the motion as herein requested, with an extension of time as requested, with any further relief that is just and proper.

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification, upon information and belief, of such filing to: Monsita Lecaroz Arribas, Esq., U.S. Trustee's Office, Noreen Wiscovitch Rentas Esq, in addition to any and all parties registered in this case to receive CM/ECF Notices. We will serve by regular mail this document to any the above-named persons, upon knowing that they are non CM/ECF participants.

RESPECTFULLY SUBMITTED.

In Carolina, Puerto Rico, June 17, 2020

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